



April 20, 2011

Project No. 8128.01.020

Mr. Dana Bayuk

Oregon Department of Environmental Quality

2020 SW 4th Avenue

Portland, Oregon 97201-4987

Re: DEQ Comments on January 17, 2011 MGP DNAPL Data Submittal  
Siltronic Corporation  
7200 NW Front Avenue, Portland, OR  
ECSI #183

Dear Dana:

On behalf of Siltronic Corporation (Siltronic), Maul Foster & Alongi, Inc. (MFA) has prepared the following response to the letter from the Oregon Department of Environmental Quality (DEQ) dated March 24, 2011. The letter included DEQ's comments on the January 17, 2011 submittal summarizing the results of the MGP DNAPL analysis and groundwater from WS-33-81. The letter directed Siltronic to revise and resubmit the DNAPL and Groundwater Data Submittal for WS-33-81 with inclusion of an assessment of whether TCE DNAPL occurs in the subsurface.

The WS-33-81 DNAPL and Groundwater Data Submittal memorandum has been revised consistent with DEQ's direction and is attached to this letter. As documented in progress reports from August 2009 to present, TCE DNAPL has not been observed during DNAPL screening. Based on the injection threshold and the solubility limit, groundwater data collected from the wells (summarized in Figure 1, attached) suggests that TCE DNAPL is not present.

DEQ's comments question the utility of MGP DNAPL analytical data for the purpose of evaluating processes related to ISCR-enhanced bioremediation. Given the absence of TCE DNAPL in the source area, and in consideration of the damage to dedicated pumps that results from monthly removal and replacement, MFA would like to discuss whether DEQ perceives any benefit or basis for continuing DNAPL monitoring in the source area.

MFA understands that the technical issues related to evaluation of TCE desorption from the MGP DNAPL are complex. In our view, it may be more productive to discuss the data and the potential confounding factors associated with subsurface heterogeneity in a collaborative setting. We look forward to setting a meeting during which we can discuss this and other topics related to source control at the Siltronic site.

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Please call either of us at (971) 544-2139 if you have questions or comments.

Sincerely,

Maul Foster & Alongi, Inc.



James G.D. Peale, RG  
Senior Hydrogeologist



Ted Wall, PE  
Oregon Operations Director

cc: Tom McCue, Siltronic Corporation (electronic and hard copy)  
Alan Gladstone, Davis Rothwell Earle and Xochihua (electronic and hard copy)  
Chris Reive, Jordan Schrader Ramis (electronic and hard copy)  
Jim Anderson, DEQ (electronic)  
Kristine Koch, EPA (electronic)  
Sean Sheldrake, EPA Seattle (electronic)  
Rene Fuentes, EPA Seattle (electronic)  
Chip Humphrey, EPA Portland (electronic)  
Lance Peterson, CDM (electronic)  
Bob Wyatt, NW Natural (electronic)  
Patty Dost, Pearl Legal Group LLC (electronic)  
John Edwards, Anchor QEA LLC (electronic)  
Carl Stivers, Anchor QEA LLC (electronic)  
Rob Ede, Hahn and Associates, Inc. (electronic)  
Tom Gainer, DEQ (electronic)  
Henning Larsen, DEQ (electronic)  
Matt McClincy, DEQ (electronic)